

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

SHARON BOST, in her individual  
capacity and as personal representative  
of the ESTATE OF FATIMA NEAL,

Plaintiff,

v.

WEXFORD HEALTH SOURCES, INC.,  
et al.,

Defendants.

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Case No. 1:15-cv-03278-ELH

Hon. Ellen L Hollander

Hon. A. David Copperthite

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**PLAINTIFF'S MOTION TO COMPEL  
TESTIMONY AND DOCUMENTS**

Plaintiff SHARON BOST, in her personal capacity and as personal representative of the ESTATE OF FATIMA NEAL, by her attorneys, pursuant to Rule 37(a) of the Federal Rules of Civil Procedure and Local Rule 104.8, respectfully requests that this Court compel Defendants Ohaneje, Ajayi, Jamal, McNulty, El-Sayed, Afre, and Harmon to provide responsive testimony currently being withheld on the basis of an inapplicable state-law privilege, and compel Wexford to produce a Monthly Incident Review Report for November 2012 and a 2012 Mortality Log that it is currently withholding under that same inapplicable state-law privilege. In support of her motion, Plaintiff adopts and incorporates the accompanying Memorandum of Law.

Respectfully submitted,

/s/ Sarah Grady

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**CERTIFICATE OF SERVICE**

I, Sarah Grady, an attorney, hereby certify that, on January 5, 2017, I filed the foregoing Plaintiff's Motion to Compel Testimony and Documents using the Court's CM-ECF system, which effected service on all counsel of record listed below. I further certify that within one (1) business day of this filing, I will cause the same to be served on Defendant Cierra Ladson at the address she provided the Court (Doc. No. 60).

/s/ Sarah Grady  
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